IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND DIVISION

STANLEY ORAKWUE and JERRY EGWU, individually and on behalf of all others similarly situated	§ § § §	
v.	§	**CIVIL ACTION NO. 7:13-CV-00051-RAJ**
RILEY GEOLOGICAL CONSULTANTS, INC. and RONALD RILEY	§ § §	

DEFENDANTS' OFFER OF JUDGMENT

TO PLAINTIFFS STANLEY ORAKWUE and JERRY EGWU:

PLEASE TAKE NOTICE that Defendants RILEY GEOLOGICAL CONSULTANTS, INC. and RONALD RILEY hereby offer to allow entry of judgment under Rule 68 of the Federal Rules of Civil Procedure as follows:

Judgment in favor of Plaintiff STANLEY ORAKWUE against Defendants on his Complaint and all causes of action alleged therein in the total sum of FOUR THOUSAND ONE HUNDRED EIGHTY ONE AND NO/100 DOLLARS ($4,181.00), exclusive of attorneys' fees and costs accrued to date.

Judgment in favor of Plaintiff JERRY EGWU against Defendants on his Complaint and all causes of action alleged therein in the total sum of SIX HUNDRED FIFTY FOUR AND NO/100 DOLLARS ($654.00), exclusive of attorneys' fees and costs accrued to date.

The above amounts represent the total amount Defendants shall be obligated to pay on account of any liability claimed herein.

This Offer of Judgment is made for the purposes specified in Rule 68 and is not to be construed as an admission that Defendants are liable in this action or that Plaintiffs have suffered any damage. If Plaintiffs fail to obtain more favorable judgments against Defendants, please take notice that pursuant to Rule 68(d), Defendants will ask the Court to deny Plaintiffs any post-offer costs, including attorneys' fees, and for an award of Defendants' post-offer costs, including but not limited to, their attorneys' fees, a sum to cover costs of the services of experts in preparation for trial, costs incurred during trial, and such other costs and fees as the Court deems proper, in addition to any other rights and remedies available under the law.

This offer will remain open until it expires by operation of law, unless otherwise withdrawn by Defendants. Evidence of this Offer is not admissible except in a proceeding to determine costs and/or fees.

Respectfully submitted,

LAW OFFICE OF MICHAEL H. CARPER, P.C.
Michael H. Carper
Robert N. Nebb
1102 Main Street
Lubbock, Texas 79401
806-747-3016 [Telephone]
806-747-8411 [Telecopier]

By: /s/ Robert N. Nebb
Robert N. Nebb
SBN: 14847900
rnebb@carperlaw.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that, on September 16, 2013, a true and correct copy of the foregoing document was filed and served via ECF upon the following attorneys of record:

Charles W. Branham, Esq.
BRANHAM LAW, LLP

Jason T. Brown, Esq.
JTB LAW GROUP, LLC

/s/ Robert N. Nebb
Robert N. Nebb